



**Second
HARVEST
FOOD BANKS**

51 North High Street
Suite 761
Columbus, Ohio
43215
614-221-4336
Fax 614-221-4338
www.oashf.org

April 18, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Federal-State Joint Board on Universal Service Lifeline and Link Up
CC Docket No. 96-45; WC Docket 03-109; WC Docket 11-42**

Dear Chairman Genachowski,

The FCC's low-income Lifeline programs have been vital to many Ohioans, especially since the beginning of the country's recent recession. For families, seniors, the disabled, and the working poor, the phone service provided by Lifeline programs often can make the difference in finding employment and even saving a life in an emergency situation.

It is for these reasons, among others, that we would like to thank you for your leadership – and for that of the FCC – in reforming and modernizing the Lifeline program. We would like to see the program remain robust, effective, and accessible so that our members can continue using these vital services as Ohioans weather these tough economic times.

We agreed with many of the FCC's recommendations to strengthen Lifeline and eliminate waste, fraud, and abuse in the program. However, we were extremely discouraged by three particular proposals: to cap the program, either temporarily or permanently; to place a "minimum charge" on users of Lifeline; and to eliminate the use of previous "self-certification" procedures.

Capping the Lifeline program at this critical economic moment in the United States is both unwise and counterproductive. At a time when Ohioans are struggling, this program is needed now more than ever. A recent report by the Food Research Action Center, titled *Food Hardship in America 2010*, paints an alarming picture of the struggle Ohioans have just to put food on the table. According to the report, one in five Ohioans, or 19 percent, are at risk of hunger.

The proposals which impose a "minimum charge" on Lifeline users and eliminate the ability of these users to "self-certify" their eligibility for the program, are of serious concern to us as we believe both proposals provide unreasonable and unfair barriers to entry to Lifeline-eligible Americans. We believe that imposing any sort of fee on eligible users of this program would be an enormous deterrent to participation.

Likewise, the idea of eliminating the ability for users to "self-certify" their eligibility for the program is unfair to the consumers and in many cases very difficult to accomplish. Many people who qualify for Lifeline, particularly minorities and seniors, simply do not have access to the computers, scanners, faxes, or photocopiers necessary to prove that they are eligible to receive Lifeline services.

The Lifeline program is extraordinarily important to our members and to our community. The FCC's efforts to strengthen Lifeline by eliminating waste, fraud, and abuse are necessary and admirable. But we hope that the FCC is equally focused on taking strong

action to ensure that Lifeline services remain available, accessible, and free to the families and individuals who need them most.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Lisa', with a stylized flourish at the end.

Lisa Hamler-Fugitt, executive director
Ohio Association of Second Harvest Foodbanks

CC:

Commissioner Michael J. Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker